

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

---

EMERALD INT'L HOLDINGS LTD

Plaintiff,

Vs

Notice of Electronic Filing  
Dated January 3, 2017

VERIZON

Defendant,

DOCKET NO: 16-CV-00978

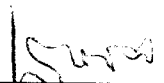
---

Pursuant to the Notice of Electronic Filing dated January 3, 2017 regarding representation of Emerald International Holdings Ltd, we have the following response:

New York's First Department and the Second Department each have held that an individual assignee of a Corporation may sue without a lawyer. (Trakman v City of New York, 182 A.D. 2d 814, 815(2d Dept, 1992); see also, Kinlay v Henley, 57 A.D. 3d 219, 220, 858 N.Y.S. 2d 62(1<sup>st</sup> Dept, 2008); Kamp v Sportswear, Inc., 39 A.D. 2d 869, 332 NYS 2d 983 (1<sup>st</sup> Dept. 1972), rev'g on dissenting opinion below, 70 Misc 2d 898, 335 NYS 2d 306 (App. Term 1972))

Unless we hear otherwise we will assume that this alleviates any lingering concerns and we can proceed with our representation of Emerald International Holdings Ltd.

Dated: Buffalo, New York  
January 17, 2017

  
\_\_\_\_\_  
Otu A. Obot, LL.M.(ihr)  
St. Thomas University School of Law  
Miami, Florida (2004)

XC: File(s)

Emerald Intl, Hdg-500  
1606 Hopkins Rd.  
Williamsville, N.Y. 14121

14202-335099

Clark, N.S. District Court, W.D.N.Y.  
R00 U.S. Courthouse  
Buffalo Square  
Buffalo, N.Y. 14202

BUFFALO NY 142  
20 JAN 2017 PM 2 L

